

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X Index No.: 07CIV6372

ADONNA FROMETA,

**FRCP Rule 26(a)(1) Disclosures**

Plaintiff,

-against-

MARIO E. DIAZ-DIAZ, ALL AMERICAN HAULERS  
RECYCLING

Defendants.

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PLEASE TAKE NOTICE that the Plaintiff, ADONNA FROMETA, does hereby set forth the following as her FRCP Rule 26(a) (1) disclosure:

1. Persons or entities likely to have discoverable information that may be used to support Plaintiff's claims or defenses:
  - a) All named parties herein
  - b) Police officer who attended the scene of this accident
  - c) Cabrini Medical Center,  
227 E 19<sup>th</sup> Street  
New York, NY 10003
  - d) Ranga Krishna, MD  
3262 Westchester Avenue  
Bronx, NY
  - e) Andrew M. Davy, MD  
1513 Voorhies Avenue  
Brooklyn, NY
  - f) Arden Kaisman, MD  
51 E 25 Street, 6 Floor  
New York, NY 10010
  - g) Standup MRI Of Manhattan  
253 E 77<sup>th</sup> Street  
New York, NY
  - h) Midtown Medical Practice, PC  
Albert Villafuerte, MD  
48 E 43<sup>rd</sup> Street, 6<sup>th</sup> Floor

New York, NY 10017

- i) Myrtle Pharmacy, Inc.  
446-A Myrtle Avenue  
Brooklyn, NY 11205
- j) Ramesh P. Babu, MD  
530 First Avenue, Suite 7w  
New York, NY 10016
- k) Westchester Medical Care, Pc  
32-62 Westchester Avenue  
Bronx, NY 10461
- l) Geico  
750 Woodbury Road  
Woodbury, NY 11797-2589

\* Note authorizations for the above medical providers are being provided herewith.  
Additionally all records currently in the plaintiff's possession are being exchanged  
herewith.

2. Documents that may be used to support claims or defenses:

- a) Police report (attached herewith)
- b) Photos of the Plaintiff's vehicle after the accident (attached herewith)
- c) Medical records and records of the following:

Cabrini Medical Center  
227 E 19<sup>th</sup> Street  
New York, NY 10003

Ranga Krishna, MD  
3262 Westchester Avenue  
Bronx, NY

Andrew M. Davy, MD  
1513 Voorhies Avenue  
Brooklyn, NY

Standup MRI of Manhattan  
253 E 77<sup>th</sup> Street  
New York, NY

Midtown Medical Practice, PC  
Albert Villafuerte, MD

48 E 43<sup>rd</sup> Street, 6<sup>th</sup> Floor  
New York, NY 10017

Arden Kaisman, MD  
51 E 25 Street, 6 Floor  
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Myrtle Pharmacy, Inc.  
446-A Myrtle Avenue  
Brooklyn, NY 11205

Ramesh P. Babu, MD  
530 First Avenue, Suite 7w  
New York, NY 10016

Westchester Medical Care, PC  
32-62 Westchester Avenue  
Bronx, NY 10461

3. Damage Computation:

The Plaintiff is claiming damages for past and future medical expenses, cost of surgery and treatment, past and future pain and suffering, loss of past and future enjoyment of life and cost of future surgery(s) and treatment.

4. Insurance Information:

GEICO – No-Fault Carrier  
750 Woodbury Road  
Woodbury, NY 11797-2589  
Claim # 0293057720101027

The plaintiff reserves the right to supplement this disclosure upon receipt of further information.

Dated: New York, New York  
September 18, 2007



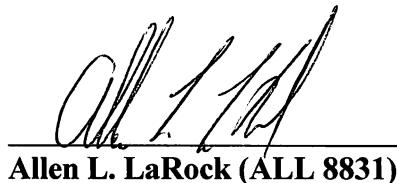
Allen L. LaRock, Esq. (ALL 8831)  
SLAWEK W. PLATTA, PLLC  
Attorneys for Plaintiff  
42 Broadway, Suite 1927  
New York, New York 10004  
(212)514-5100

To:

WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP  
Attorneys for Defendants  
MARIO E. DIAZ-DIAZ, ALL AMERICAN HAULERS RECYCLING  
150 East 42<sup>nd</sup> Street  
New York, New York 10017-5639  
212-490-3000

**CERTIFICATION**

I hereby certify that the foregoing **FRCP Rule 26(a)(1) Disclosures** are true. I am aware that if any of the foregoing statements made by me are willingly false, I am subject to punishment.



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Allen L. LaRock (ALL 8831)

Sworn to before me on this  
September 18, 2007



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Notary Public

SLAWOMIR W. PLATTA  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 02PL6171290  
Qualified in Kings County  
My Commission Expires July 23, 2011

**AFFIRMATION OF SERVICE**

STATE OF NEW YORK      )  
                              ) s.s.:  
COUNTY OF NEW YORK    )

Slawek W. Platta, an attorney admitted to practice law before the courts of the State of New York affirms the following under penalties of perjury, pursuant to CPLR 2106:

That affirmant is not a party to this action and is over the age of 18 years.

That on September 18, 2007, affirmant served the within **FRCP Rule 26(a)(1) Disclosures** upon the defendant(s) and/or attorney(s) for defendant(s) by depositing a true copy of same securely enclosed in a postpaid wrapper in a post office, official depository under the exclusive care and custody of the United States Postal Service within the state of New York, directed to said individuals or offices as follows:

**WILSON ELSER MOSKOWITZ, EDELMAN & DICKER, LLP**  
150 E 42<sup>ND</sup> STREET  
NEW YORK, NY 10017-5639

these being the respective addresses within the State designated by them for that purpose upon the preceding papers in this action or the respective place where they kept an office between which places there then was and now is a regular communication by mail.

  
\_\_\_\_\_  
SLAWEK W. PLATTA

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X Index No.: 07CIV6372

ADONNA FROMETA,

Plaintiff,

-against-

MARIO E. DIAZ-DIAZ, ALL AMERICAN HAULERS  
RECYCLING

Defendants.

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**FRCP Rule 26(a)(1) Disclosures**

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SLAWEK W. PLATTA, PLLC  
*Attorneys for: Plaintiff*  
42 Broadway, Suite 1927  
New York, New York 10004  
(212) 514-5100

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Service of a copy of the within is hereby admitted.  
Dated, Plaintiff  
Attorney(s) for

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PLEASE TAKE NOTICE:

NOTICE OF ENTRY

that the within is a (certified) true copy of an \_\_\_\_\_ duly entered in the office of  
the clerk of the within named court on \_\_\_\_\_ 200\_\_\_\_.

NOTICE OF SETTLEMENT

that an order \_\_\_\_\_ of which the within is a true copy  
will be presented for settlement to the HON. \_\_\_\_\_ one of the judges of  
the \_\_\_\_\_

within named Court, at

200\_\_\_\_\_ at \_\_\_\_\_ O'clock \_\_\_\_\_.M.

on

Dated, September 18, 2007

Yours, etc.

**SLAWEK W. PLATTA, PLLC**